

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROSA GLOVER

Plaintiff,

v.

**PHILADELPHIA MARINE TRADE
ASSOCIATION - INTERNATIONAL
LONGSHOREMEN ASSOCIATION
CONTRACT BOARD**

Defendant.

:
:
:
:
:
:
:
:
:
:
:

CIVIL ACTION NO. 08-122

JURY TRIAL DEMANDED

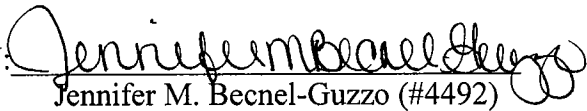
DEFENDANT'S MOTION TO DISMISS

Defendant Philadelphia Marine Trade Association - International Longshoreman Association Contract Board hereby moves this Court, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss Plaintiff's Complaint for failure to state a claim upon which relief may be granted.

Because Plaintiff's underlying charge of discrimination was not timely filed with the EEOC, her claim for religious discrimination is untimely. As a result, the Complaint fails to state a claim upon which relief may be granted and should be dismissed with prejudice. In support of its motion, Defendant incorporates by reference the reasons articulated in its Memorandum of Points and Authorities in support of its Motion to Dismiss.

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

BY: 
Jennifer M. Becnel-Guzzo (#4492)

1000 West Street, Suite 1410

Wilmington, DE 19801

(302) 552-4200

jennifer.becnelguzzo@bipc.com

Attorneys for Defendant

Dated: May 1, 2008

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

ROSA GLOVER

Plaintiff,

v.

**PHILADELPHIA MARINE TRADE
ASSOCIATION - INTERNATIONAL
LONGSHOREMEN ASSOCIATION
CONTRACT BOARD**

Defendant.

:
:
:
:
:
:
:
:
:
:
:
:

CIVIL ACTION NO. 08-122

JURY TRIAL DEMANDED

ORDER

AND NOW on this ____ day of _____, 2008, upon consideration of Defendant Philadelphia Marine Trade Association - International Longshoremen Association Contract Board's Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6) and any response thereto, **IT IS HEREBY ORDERED THAT DEFENDANT'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT WITH PREJUDICE IS GRANTED.**

J.